## Dodge Avenue Water Line, City of Evanston

## Benning, Brad

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Superfund activities concerning the Dodge Avenue water line in the City of Evanston, pursuant to their notification to the Agency, received on September 25, 2015:

- The notification package was forwarded to Superfund from the Water Division on 10/5/2015, requesting possible assistance regarding the presence of coal tar constituents discovered during the replacement of the Dodge Ave. water line in 2015. The City of Evanston believes the source of the contaminant is from the former Skokie MGP Site located approximately 1/2 mile west of Dodge Ave.
- The Skokie MGP Site was remediated by Com-Ed and Nicor under the Illinois EPA Site Remediation Program, and was completed in 2013. Jeff Guy, the State's Project Manager was contacted regarding the remediation. The project was a complete dig and haul removal of all the contamination from the site. Any off-site impacts were to be identified, but it is unclear if distribution lines were discovered leaving the site property. Nicor was the lead during the removal work and the State recommended contacting Nicor for possible maps of the old distribution lines.
- Contacted Mike Partee, of Nicor. Nicor and ComEd are already in Federal Court with the City of Evanston concerning the coal tar issue and the methane gas issue (Nov. 5, 2014). The Illinois EPA declined enforcement actions since the site was remediated and the RPs inspected and determined that distribution lines leaving the site were clean. Due to the ongoing court action Nicor was onsite during the Dodge Ave. water main replacement work and apparently split samples with the City's consultant. Nicor believes their samples do not indicate MGP type contamination and they did not observe coal tar odors or see evidence of coat tar in the trench. Nicor believes the City has not fully investigated the pre-RCRA landfill (James Park) as a possible source of contaminants. Since USEPA did not join the Citizen Suit filed by the city, Nicor believes they are now trying to draw USEPA into the issue.
- Contacted City of Evanston, Tim Bartus, Department of Public Works. The old water line in question dates back to 1907, and as a result numerous breaks on the line the main was replace in 2015, on Dodge Ave. between Oakton and Mulford roads. During the replacement work the coal tar constituents were discovered on a crust material on a shallow 24" unknown pipe which parallels the water line, in the soil backfill, and on the same type of crust on the water main. the constituents were discovered at various levels in numerous samples collected by the City's consultant. The city has no record of this 24" line and has no knowledge if the line is active or abandon or is somehow connected to the Skokie MGP Site. The City also states there was a definite odor of coal tar during the work. Water samples collected from several locations on this section of the system indicated no

contamination. The project was completed, sections of the old water main were saved and are located at the Public Works building. The City does not seem to be aware of any east/west lines that might have connected to this 24" line along Dodge Ave. Currently this section of Dodge Ave. is the only impacted area the City has identified.

- There is some historical information on the internet that steel pipe that dates back to the early 1900s, may have been coated with asphalt/coal tar to reduce corrosion impacts. Unknown if it could be determined, and the main in question was cast iron.
- The Water Division does not believe it has the authority under SWDA to demand removal of the contaminants, but can require the City to take protective actions when working and potentially exposing the water line.
- Superfund action is unlikely as there is no impact to the pubic water system.